UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

In Re: Electro Sales & Service, Inc.

§ Case No. 21-50546-MMP

§ §

DEBTOR § Chapter 7

Mr. W. Fireworks, Inc.

Plaintiff

V.

Electro Sales & Service, Inc.

And 2317 Pinn Road Investment, Inc.

Defendants Case No. 22-05045-MMP

MOTION TO WITHDRAW AS COUNSEL FOR SALIM ABBAS MERCHANT INDIVIDUALLY

Adversary Proceeding

TO THE HONORABLE JUDGE OF SAID COURT:

Cynthia Zuniga Puig, Movant herein, files this Motion to Withdraw as Counsel and respectfully shows the Court as follows:

- 1. Movant states the following facts which establish good cause for this request.
- 2. On August 21, 2023 the Movant personally met with Mr. Salim Abbas Merchant.
- 3. Movant explained to Mr. Merchant that he was personally sued by the Chapter 7 Trustee and that an answer to that claim was filed by the Movant. The undersigned further explained that an amended claim was filed against him individually by the Chapter 7 Trustee on August 17, 2023 but that an answer had not yet been filed
- 4. Mr. Merchant advised the Movant that he did not want attorney representation in the matter that was filed against him personally and that he wanted to represent himself.
- 5. Mr. Merchant wrote a letter to the Court regarding his wishes to which I have attached hereto as Exhibit "A" and incorporated herein.

PRAYER: Movant prays that the Court grant this Motion and allow Cynthia Zuniga Puig to withdraw as attorney of record in this cause. Movant further requests such other and further relief as may be determined by the Court to be appropriate.

Respectfully submitted,

DANIELS & DANIELS 11120 Wurzbach Road Oak Ridge Square, Suite 301 San Antonio, Texas 78230 Telephone: (210) 225-4595 Fax. (210) 225-5673

Cynthia Zuniga Phig

Email: cynthiapuig@danielslawfirm.org

State Bar No. 22293457

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2023 a true and correct copy of the above and foregoing was served upon the following parties via electronic means as listed on the Court's ECF Noticing System or by regular first class mail:

Electro Sales & Service, Inc.	Steven Cennamo	Salam Merchant
27015 Granite Path	8546 Broadway, Suite 100	27015 Granite Path
San Antonio, Texas 78258	San Antonio, TX 78217	San Antonio, Texas 78258
AMEX Becket & Lee PO Box 3001 Malvern, PA 19355	United States Trustee 615 E. Houston, Rm. 533 San Antonio, Texas 78205	Bexar County Tax Collector c/o LinebargerGogganBlair&Sampson 711 Navarro St., #300 San Antonio, TX 78205
Frost Bank	Jose C. Rodriguez	Morris E. "Trey" White III
Attn.: Bankruptcy Dept.	Chapter 7 Trustee	Villa & White LLP
P.O. Box 1600	1101 W. 34 th Street, #223	1100 N.W. Loop 410, Suite 802
San Antonio, TX 78296	Austin, TX 78705	San Antonio, Texas 78213
Clint Buck 4630 North Loop 1604 West Suite 206 San Antonio, Texas 78249	San Pedro Real Estate, LLC 5025 Timberhill, Suite 111 San Antonio, Texas 78228	Tibor & Daniela Ritter PO Box 782129 San Antonio, Texas 78278

Raymond Battaglia 66 Granburg Circle San Antonio, Texas 78218

Cynthia Zuniga Puig

August 21, 2022

To The Honorable Judge Michael Parker:

I, Salim Abbas Merchant, do hereby inform the Court that I do not want anyone representing me personally. I have the right to, and I want to represent myself. Please allow Ms. Cynthia Zuniga Puig to withdraw as my personal attorney in case number 21-50546-MMP and case number 22-05045-MMP.

Please all correspondence regarding these cases to my home address at:

27015 Granite Path

San Antonio, Texas 78258

My email address is salimmerchant04@gmail.com.

Thank you for your attention to this matter.

Sincerely,

Salim Abbas Merchant

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Ex. "A"

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ORDER ON MOTION TO WITHDRAW AS COUNSEL FOR SALIM ABBAS MERCHANT INDIVIDUALLY

Came to be heard the Motion to Withdraw as Counsel for Salim Abbas Merchant, Individually filed by Cynthia Zuniga Puig, and it appears to the Court that the Motion should be granted. It is, therefore,

ORDERED that the above-referenced Motion is hereby **GRANTED**. It is further.

ORDERED that Cynthia Zuniga Puig is authorized to withdraw as counsel for Salim

Abbas Merchant.

PREPARED BY:

DANIELS & DANIELS 11120 Wurzbach Road Oak Ridge Square, Suite 301 San Antonio, TX 78230 Telephone: 210-22**5**-4595

Fax: 210-225-567/3

Email: cynthiapu/g@danielslawfirm.org

Cynthia Zuniga Puig

State Bar No. 22293457